

**MEMO ENDORSED**

May 25, 2024

**BY EFC**

Hon. Judge Valerie E. Capron  
United States District Court Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

USDC SDNY  
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**Re: United States v. Washington 21-CR-603 (VEC)**

Honorable Judge Caproni,

**Introduction:** William Washington, proceeding pro se, respectfully submits this motion to object to the Court's order excluding time from May 24, 2024, to June 24, 2024, under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

**Background:**

1. On February 6, 2024, this Court granted William Washington motion to proceed pro se.
2. On February 21, 2024 William Washington received the full Discovery file from the CDA as ordered by the court.
3. On March 27, 2024, this Court granted a motion to withdraw William Washington plea agreement
4. The Court set the trial date for June 24, 2024, a mere eighty eight (88) days after granting William Washington motion to proceed to trial.
5. William Washington requested an adjournment to allow adequate time to investigate the voluminous discovery file. See, Dkt. 1371.
6. The Court denied William Washington request, asserting that William Washington had sufficient time to review discovery while represented by counsel, despite a lack of evidence showing William Washington had cumulative discovery and despite the fact that William Washington noticed the court [See, Dkt. #1315] numerous times that he was deprived of discovery while represented by CJA counsel. See, Dkt. #1372 at 8.
7. On May 24, 2024, the Court issued an order excluding time until June 24, 2024, citing the complexity of the case.

**Argument:** The Court's exclusion of time under the Speedy Trial Act is inconsistent with its previous refusal to acknowledge the complexity of the case when setting the trial date. This

inconsistency undermines William Washington Sixth Amendment right to a speedy trial and adequate preparation time.

**Complexity and Timing:** The Court's previous refusal to grant an adjournment based on the case's complexity contradicts its current justification for excluding time. If the case is indeed complex, William Washington should have been granted more time to prepare as a pro se defendant.

**Adequate Time for Investigation:** As a pro se defendant, William Washington has not had adequate time to investigate the voluminous discovery file. The assertion that William Washington had sufficient time to review discovery while represented by counsel for 2 years is unsupported by the record. There is no record of William Washington having cumulative discovery prior.

**Right to a Speedy Trial:** The exclusion of time undermines William Washington's right to a speedy trial. The delay should not be used to compensate for the Court's earlier refusal to grant a continuance. If the case is complex, William Washington requires adequate preparation time, not an arbitrary exclusion of time.

**Conclusion:** For the foregoing reasons, William Washington respectfully requested that the Court reconsider its order excluding time under the Speedy Trial Act and ensure a timely trial or, alternatively, grant adequate preparation time if the case's complexity is acknowledged.

Application DENIED as moot. Pursuant to 18 U.S.C. § 3161(h)(D), time is excluded due to Dr. Washington's filing of the motion *in limine* at Dkt. 1469. The Court will hear oral argument on Dr. Washington's motion at the final pretrial conference.

SO ORDERED.



05/29/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

Sincerely,

/s/ William J. Washington  
William J. Washington MD, Pro Se  
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